

American Gilsonite Company

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Bonanza Minesite HC 73 Box 28 Vernal Utah 84078-9284 • Phone (435) 789-1921 • Fax (435) 789-1956

RECEIVED

MAY 25 2001

State of Utah Department of Natural Resources Division of Oil, Gas and Mining 1594 West North Temple, Suite 1210 Salt Lake City, Utah 84114

DIVISION OF OIL, GAS AND MINING

Attn: Tony Gallegos

May 23, 2001

Re: Purposed changes to the sealing of escapeway shafts at H-2, H-10 and R-4 sites

Dear Mr. Gallegos

American Gilsonite Co. received a letter from the Division on May 2, 2001, which referenced our letter to your office concerning the use of Polyurethane Foam (PUF). In your May 2, letter, you had some questions concerning our proposal to use PUF to seal some of the remote escapeways shafts we are now reclaiming. I trust the following will address all of the questions raised by the Division, and that by the following explanation, the Division will allow us to modify our Reclamation Plan to include the use of PUF as an additional method of sealing our Gilsonite mine shafts.

Your Question: Describe the reason for lack of road access to the escapeway site?

• The reason for the lack of roads at these locations is when this area was mined a road was not constructed. These shafts were escapeways, and seldom used.

Your Question: Describe how the form supplies and foam would be transported to the site?

 The foam is purchased in 22lb bags. All materials can be carried to the site by hand.

Your Question: How many escape way closures are being proposed at these sites?

• There are a total of 3 sites (H-2, H-10, R-4). At each site there is one escapeway that we purpose to seal with PUF.

Your Question: Describe the dimension of each escapeway opening and its depth?

• The dimension of each shaft varies from 2 to 2 ½' wide and 10 to 15' long. The depth is unknown.

Your Question: Describe the shaft supports and how the will be tied into the wall?

• The trench supports that will be use are of steal construction and has a screw extension that will extend into the walls. Indentations will be cut into the sandstone walls of the escapeway shaft, and this will also insure that the seal is locked into place.

American Gilsonite Company (AGC) will install the trench supports down 6' and install 5' of Polyurethane Foam. Two layers of chain link fence, approximately 2' apart will be encapsulated inside the foam. This will help insure a more tamperproof seal. A 1'cap of soil will be placed over the PUF seal, for UV protection. AGC believes that sealing these shafts in this manner will be safe and permanent.

The location of the H-10 site is located in the NE ¼ of the SW ¼ of Section 1, Township 11 South, and Range 23 East. I have included 2 TOPO maps the showing the escapeway shafts at H-2 and H-10.

At H-2 site AGC would like to cap the main shaft with existing 4'x4'x3' concrete footers. Then cap with 3' of soil. This closure method will be safe and vandal resistant because the shaft would be sealed by concrete and soil.

AGC appreciates the Division in helping us with these amendments in our mine reclamation plan. If you have any question please contact me at (435-789-1921).

Thank you,

Lee Jenkins

Environmental Coordinator



